

## **REMARKS**

Claims 1, 3 and 7-13 are all the claims pending in the application.

### **I. Claim Rejections under 35 U.S.C. § 103(a)**

A. Claims 1, 3 and 11-13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Rowe (US 2005/0124407) in view of Bryant et al. (US 7,318,774) and Nadooshan et al. (US 2003/0145204), and further in view of Mathews (US 2005/0282612).

Claim 1 recites the features of a secure device having a first storage unit operable to previously store first application programs for reproducing content in a members-only operation mode, each of the first application programs being an application program customized for a corresponding one of the groups indicated by the plurality of sets of membership information held by a membership information hold unit; and a selection unit operable to select a first application program corresponding to a group to which a membership service provider belongs, from among the first application programs stored in the first storage unit.

In other words, claim 1 is characterized by (i) a secure device which stores an application program customized for each group and (ii) a selection unit which selects an application program associated with a group to which a membership service provider belongs. It is noted that the membership service provider provides content to be reproduced by the content reproduction terminal according to the claimed invention.

Accordingly, by providing the above-noted features recited in claim 1, as long as the user has a secure device, when the user views content provided by any membership service provider using any content reproduction terminal, there is a unique advantage that the user can view the content with a customized application program.

Applicants respectfully submit that the cited prior art references do not teach or suggest at least the above-noted features recited in claim 1.

In particular, regarding Nadooshan, Applicants note that this reference discloses a smart card in which information for each group is registered (see paragraph [0021] and Fig. 3). However, in Nadooshan, the information stored in the smart card only includes IDs of groups and values unique to each of the groups (see paragraph [0021]). Thus, Applicants submit that Nadooshan does not disclose or suggest the above-noted characteristic (i) of claim 1 directed to a secure device which stores an application program customized for each group.

Further, while Nadooshan discloses a user enrollment process and user verification process that are performed between each user computer device and the smart card (see paragraphs [0019] and [0020]), Applicants respectfully submit that Nadooshan also does not disclose or suggest the above-noted characteristic (ii) of claim 1 directed to a selection unit which selects an application program associated with a group to which a membership service provider belongs.

In view of the foregoing, Applicants respectfully submit that Nadooshan does not teach or suggest the above-noted features recited in claim 1 of a secure device having a first storage unit operable to previously store first application programs for reproducing content in a members-only operation mode, each of the first application programs being an application program customized for a corresponding one of the groups indicated by the plurality of sets of membership information held by a membership information hold unit; and a selection unit operable to select a first application program corresponding to a group to which a membership service provider belongs, from among the first application programs stored in the first storage unit.

Moreover, Applicants submit that even if Nadooshan is considered in combination with Rowe, Bryant, and Mathews, that the combination of such references would not teach, suggest or otherwise render obvious at least the above-noted features recited in claim 1.

Accordingly, Applicants submit that claim 1 is patentable over the cited prior art, an indication of which is kindly requested.

Further, Applicants note that claim 1 has been amended by deleting the term “sport” from the phrase “content that is video or music of one of a plurality of genres including sport, drama, movie, and education”.

In this regard, while Mathews may disclose the use of a sports theme gaming apparatus, Applicants respectfully submit that neither Mathews nor the other cited references disclose content that is video or music of one of a plurality of genres including drama, movie, and education, as recited in amended claim 1.

In view of the foregoing, Applicants submit that claim 1 is patentable over the cited prior art, an indication of which is kindly requested. Claims 3 and 11 depend from claim 1 and are therefore considered patentable at least by virtue of their dependency.

Regarding claim 12, Applicants note that this claim has been amended in a similar manner as claim 1, and recites that a first application program corresponding to a group to which the membership service provider belongs is selected from among the first application programs stored in a first storage unit, and that each of the first application programs is an application program customized for a corresponding one of the groups indicated by the plurality of sets of membership information held in the membership information hold step.

For reasons at least similar to those discussed above in connection with claim 1, Applicants respectfully submit that the cited prior art references do not teach, suggest or otherwise render obvious at least the above-noted features recited in claim 12.

Accordingly, Applicants submit that claim 12 is patentable over the cited prior art, an indication of which is kindly requested. Claim 13 depends from claim 12 and is therefore considered patentable at least by virtue of its dependency.

B. Claims 7-10 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Rowe (US 2005/0124407) in view of Bryant et al. (US 7,318,774), Nadooshan et al. (US 2003/0145204), and Mathews (US 2005/0282612), and further in view of Guthery (US 6,779,112).

Claims 7-10 depend from claim 1. Applicants respectfully submit that Guthery does not cure the deficiencies of Rowe, Bryant, Nadooshan, and Mathews, as discussed above, with respect to claim 1. Accordingly, Applicants submit that claims 7-10 are patentable at least by virtue of their dependency.

## **II. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited.

If any points remain in issue which the Examiner feels may best be resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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